

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MOSAID Technologies Incorporated,

Plaintiff,

v.

Dell, Inc., et al.,

Defendants.

Case No. 2:11-CV-179 (CMC-MHS)

JURY TRIAL DEMANDED

**AGREED MOTION TO STAY PROCEEDINGS AS BETWEEN PLAINTIFF MOSAID
TECHNOLOGIES INC. AND DEFENDANTS HUAWEI TECH. CO., LTD.; HUAWEI
DEVICE USA INC.; HUAWEI TECHNOLOGIES USA INC.; AND FUTUREWEI
TECHNOLOGIES, INC.**

Plaintiff MOSAID Technologies Incorporated (“MOSAID”) and Defendants Huawei Technologies Co., Ltd.; Huawei Device USA Inc.; Huawei Technologies USA Inc.; and Futurewei Technologies, Inc. (collectively, “Huawei Entities”) have agreed, pursuant to the terms of an agreement between the parties to resolve this dispute, to settle the claims among them asserted in this case and anticipate seeking dismissal of the Huawei Entities by June 14, 2013. MOSAID and the Huawei Entities have agreed to mutually stay all upcoming deadlines with respect to each other while MOSAID and the Huawei Entities work toward dismissal.

Therefore, MOSAID and the Huawei Entities file this Agreed Motion to Stay Proceedings with respect to each other up to and including June 14, 2013. This request is not made for the purposes of delay or for any other improper purpose.

A proposed order is attached.

Dated: May 7, 2013

Respectfully submitted,

By: s/Theodore Stevenson, III (with
permission by Robert J. Williams)

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Huawei Technologies Co., Ltd.; Huawei Device USA Inc.; Huawei Technologies USA Inc.; and Futurewei Technologies, Inc. and counsel for MOSAID Technologies Inc. have met and conferred, and that MOSAID Technologies Inc. has agreed to this motion.

s/Robert J. Williams

Robert J. Williams

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via e-mail.

s/Robert J. Williams

Robert J. Williams

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ORDER

Before the Court is an Agreed Motion to Stay Proceedings as Between Plaintiff MOSAID Technologies Inc. and Defendants Huawei Technologies Co., Ltd.; Huawei Device USA Inc.; Huawei Technologies USA Inc.; and Futurewei Technologies, Inc. Having considered the motion, the Court finds that it is well taken and it is hereby GRANTED.

The Court ORDERS that the all upcoming deadlines as between MOSAID Technologies Inc. and Huawei Technologies Co., Ltd.; Huawei Device USA Inc.; Huawei Technologies USA Inc.; and Futurewei Technologies, Inc. are hereby STAYED up to and including June 14, 2013.